

## Churchill, Julie M

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**From:** Keith Bowden <kebo01@msn.com>  
**Sent:** Tuesday, July 05, 2016 2:06 PM  
**To:** Churchill, Julie M; Elizabeth McCarthy; Patrick Bird  
**Cc:** Keith Bowden  
**Subject:** Technical Comments #1 - Fiberight Project in Maine  
**Attachments:** NHSM-MsChurchill-EPA1-FINAL-JULY5.pdf

**Importance:** High

Ms. Churchill, Ms. McCarthy and Mr. Bird,

I believe the draft licenses that the Maine DEP has issued for the Fiberight/MRC solid waste processing facilities do not comply with state or federal law, particularly with respect to the Non-Hazardous Secondary Materials issue for the residue (PHS) to be burned from the Sugar Hydrolysis Process, with which I have first hand experience with from my former employer - Red Shield Acquisitio, dba Old Town Fuel and Fiber.

Based on the information for the permits and the supplemental documents that are part of the record, I therefore conclude that both the Air Emissions License and the Solid Waste License applications should be denied.

A public hearing on all of the Fiberight applications is requested to address these and other technical issues raised in the attached document and a second one to follow later this afternoon (before the 5 PM deadline) that focuses more on the Solid Waste License findings.

Keith Bowden  
Orrington, Maine